

Saul Ewing

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FEB 17 2015

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VIA ECF & FACSIMILE (609) 989-0451

The Honorable Douglas E. Arpert, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

February 13, 2015

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FEB 11 2015

DOUGLAS E. ARPERT
U.S. MAGISTRATE JUDGE

Re: *Helsinn Healthcare S.A., et. al. v. Dr. Reddy's Laboratories, Ltd., et al.*
Civil Action No. 11-3962 (MLC)(DEA)

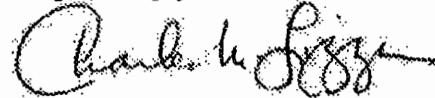
Dear Judge Arpert:

This firm, together with Paul Hastings LLP and Loeb & Loeb LLP, represents Plaintiffs Helsinn Healthcare S.A. and Roche Palo Alto LLC ("Plaintiffs") in the above-captioned matter.

As discussed at the conference with Your Honor this past Wednesday, February 11, enclosed is a proposed amended case schedule to which the parties have agreed. If this meets with the Your Honor's approval, we respectfully request that Your Honor sign the below form of endorsement and enter the schedule on the docket.

Thank you for Your Honor's kind attention to this matter.

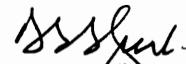
Respectfully yours,



Charles M. Lizza

cc: All Counsel (via e-mail)

SO ORDERED on this 17th day of February, 2015.



Hon. Douglas E. Arpert, U.S.M.J.

Helsinn et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-03962 / 13-05815 Schedule

Revised *(dcl)*

| Event | Current Schedule | Proposed Schedule |
|---|-------------------|----------------------------------|
| Deposition of Dr. DeLuca | | February 10, 2015 (Completed) |
| Deposition of Dr. Candiotti | | February 13, 2015 |
| Deposition of Dr. Kirsch | | February 26, 2015 |
| Exchange list of legal issues | January 14, 2015 | Completed |
| Exchange fact witness lists (aside from those witnesses called for impeachment purposes, only the witnesses set forth may testify at trial) | January 21, 2015 | Completed |
| Exchange expert witness lists (no expert shall be permitted to testify at trial unless identified at this time) | January 21, 2015 | Completed |
| Exchange objections to fact and expert witness lists | February 4, 2015 | February 27, 2015 |
| Exchange exhibit lists | February 25, 2015 | March 18, 2015 |
| Exchange electronic collection of exhibits from parties' respective exhibit lists in a mutually acceptable format | March 3, 2015 | March 24, 2015 |
| Exchange objections to the opposing party's exhibit list | March 18, 2015 | April 8, 2015 |
| Exchange affirmative deposition designations | February 4, 2015 | March 2, 2015 |
| Exchange deposition counter-designations and objections to affirmative designations | February 25, 2015 | March 25, 2015 |
| Exchange objections to counter designations | March 11, 2015 | April 8, 2015 |
| Exchange stipulation of facts for the issues on which the parties have the burden of proof | February 4, 2015 | February 25, 2015 |
| Exchange responses to stipulation of facts | March 3, 2015 | March 24, 2015 |
| Exchange contested facts | March 20, 2015 | April 10, 2015 |
| Exchange lists of the parties' contemplated motions <i>in limine</i> | January 23, 2015 | Completed |
| Meet and confer in an attempt to reach mutual resolutions regarding the parties' contemplated motions <i>in limine</i> | January 30, 2015 | March 2, 2015 |
| Serve opening motions <i>in limine</i> | February 27, 2015 | March 24, 2015 |
| Serve responses to motions <i>in limine</i> | March 20, 2015 | April 14, 2015 |
| Plaintiffs serve draft Pretrial Order text | March 11, 2015 | April 1, 2015 |
| Defendants serve rebuttal to Plaintiff's draft Pretrial Order text | March 18, 2015 | April 10, 2015 |
| Proposed Final Pretrial Order Due | March 25, 2015 | April 17, 2015 |

Helsinn et al. v. Dr. Reddy's Labs. et al. (D.N.J.)
Proposed Consolidated 11-03962 / 13-05815 Schedule

| Event | Current Schedule | Proposed Schedule |
|--|---|------------------------|
| Final Pretrial Conference | April 8, 2015 at 10:30 am | April 29, 2015 at 2 pm |
| Trial Briefs and Proposed Findings of Facts and Conclusions of Law | Two weeks before trial | May 19, 2015 |
| Trial | Subject to Court's availability; consistent with an April/May 2015 trial date | June 2, 2015 |